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AccuClaim Manual

Meal Counts Count!

United States Department of Agriculture
Food and Nutrition Service
FNS-260



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Introduction

This manual was written as a guide for school food service personnel to help them meet new requirements in the National School Lunch Program (NSLP). These regulation changes, referred to as AccuClaim, were developed to improve the accuracy and accountability of reimbursement claims by clarifying school and school food authority (SFA) meal counting and claiming requirements. (The new regulations require that reimbursement is claimed for only those reimbursable meals served to eligible children at the correct rate of reimbursement for those meals.)

These regulation changes are a result of recent audits and administrative review findings that identified a number of SFAs that improperly claimed reimbursement for meals served in the NSLP. In May 1987, the U.S. Department of Agriculture's Office of the Inspector General (OIG) released a report summarizing audits conducted at 13 SFAs in 6 States over a period of 3 years. Specifically, the audits found that:

- SFAs had not established effective meal count procedures;
- Schools were not following the SFA's free and reduced-price meal counting procedures; and
- SFAs were not effectively monitoring or enforcing compliance with program requirements.

OIG also found that the Assessment, Improvement and Monitoring Systems (AIMS) reviews conducted by State agencies would not necessarily have disclosed the meal count and overclaim problems since the AIMS performance standards do not require an evaluation of SFA systems of internal controls and monitoring procedures.

Schools and SFAs across the Nation use different meal counting systems and procedures, from the simplest roster method to state-of-the-art computerized technology. Any of these systems is capable of fulfilling the new regulatory requirements. Each SFA must choose its system based on an evaluation of the schools under its jurisdiction. Whatever systems or procedures used, SFAs and schools are responsible for ensuring that the cash reimbursement they claim is based on accurate meal counts by category. A school system can never claim more free or reduced-price meals than are served to

eligible children. If claims are in excess, the SFA may be required by the USDA to repay any overclaims. Proper implementation of the AccuClaim regulations will ensure an accurate system and prevent overclaims.

To evaluate a meal count system, 11 criteria have been developed. This manual was designed to illustrate the goals of each part of the meal count system and to show how each goal can be accomplished. In those areas that are addressed by the new regulations, the regulation language is provided for reference.



1. **System Selection:** Evaluation of school needs and program objectives resulting in the selection of a system that provides accurate meal counts by category and protects the child's identity.

GOALS:

The best system will:

Facilitate accurate counts by category;

Protect the identity of eligible children; and

Meet the needs of the school/SFA, i.e., cost, use of existing facilities/equipment, staff capabilities, etc.

MEANS:

- The following school data should be considered when choosing a system:
 - Size of school(s)
 - Percentage of students participating in the program
 - Staff resources available to implement and maintain collection procedures
 - Cost of implementing and maintaining a collection procedure.
- Be familiar with different procedures available (see "Examples of Medium of Exchange Systems" on page 8).

2. **Guidance:** Written instructions for all personnel detailing the operation of the meal count system.

GOALS:

Guidance materials are correct, up to date, and available to responsible personnel.



MEANS:

- Based on the approved free and reduced-price policy statement, develop written standard operating procedures that detail the responsibilities and duties of each person involved in the meal count system.
- Review guidance annually to ensure that all information is correct.
- Ensure that each school and appropriate personnel in the system have a copy of the approved policy statement and standard operating procedures on file.
- Ensure that the school's meal count system reflects the approved policy.

3. **Training:** Instruction for the food service personnel to make them aware of their duties and responsibilities in the meal count system.

GOALS:

All personnel involved in the meal count system must know their responsibilities and adequately perform their duties.

Maintain an efficient and effective meal count staff.

MEANS:

- An annual workshop or training session should be conducted for all appropriate personnel.
- New and substitute staff members should receive appropriate orientation on their duties and responsibilities.
- Record all training for future reference. Document all training conducted, including name(s) and title(s) of instructors, dates, topics covered, and trainees.
- Provide technical assistance as needed during actual operation of the meal service.
- Evaluate the extent to which all personnel follow established procedures.

4. **Eligibility Documentation:** The school's list of students eligible for free and reduced-price meals.

GOALS:

The list of students eligible for free and reduced-price meals is:

Based on applications that have been approved in accordance with the regulations;



Kept up to date;

Available to the person issuing the "medium of exchange" (tickets, tokens, IDs, etc.), and to the SFA official who makes the monthly claim.

MEANS:

- Approving official must examine each application to determine that it is complete, and must use the income eligibility guidelines correctly. A second party should review the applications for accuracy of approval.
- Applications from food stamp/Aid to Families with Dependent Children (AFDC) households must include: name of child, child's food stamp or AFDC case number, and signature of an adult household member. Applications from other households must include: names of all household members, social security number of each household member 21 years old or older or an indication that member does not have a social security number, amount and source of income received by each household member, total household income, and signature of an adult household member.
- The school or SFA must update the list when changes occur in eligibility or population. Lists should be available for each school.
- Update when: there is a change in family size or income level that changes the student's category, verification establishes a change in category, students transfer into and out of school, or temporary approvals change status.
- Maintain printed list or roster that protects the child's identity.

5. **Medium of Exchange:** Any type of ticket, token, ID, name, or number which is issued to the students for obtaining a meal.

GOALS:

The school count and collection system must ensure that the medium of exchange prevents overt identification of free and reduced-price meal recipients in the coding, distribution, and collection process, in accordance with 7 CFR Part 245.

The medium of exchange and master roster **accurately** reflect the students' eligibility for free, reduced-price, or paid meals.

There must be a policy for the replacement of lost and/or stolen tickets which ensures that eligible children can receive a meal.

MEANS:

- Determine how the medium of exchange will be coded.
- Use common location and time where all students are required to obtain their medium of exchange (not in the serving line).
- Allow adequate time and area for all students to purchase or pick up the medium of exchange to prevent overt identification.
- Offer incentives for prepayment options if cash is accepted in the serving line.
- Use common serving areas, dining areas, and serving time for all students during the meal service.
- Use an up-to-date master roster as the basis for issuing the medium of exchange which identifies a student's eligibility category.
- Use a medium of exchange or master roster which is coded clearly for the person(s) recording meal counts and preparing monthly claims.
- Use a medium of exchange which cannot be easily duplicated.
- Establish procedures which replace the missing ticket or provide a replacement meal (refer to FNS Instruction 765-7, rev. 2).

Suggested Coding Methods:

EXAMPLES:

Coding series

1 through 1,999 free / 2,000 through 3,999 reduced / 4,000 through 5,999 paid.

Coding by student ID number

Number ending in 0, or in an odd or even numeral.

Coding by variations.....

Variations in signature, placement of date, or ticket distributor such as Mary Smith, Mary J. Smith and M. Smith

Coding by subtle differences.....

Differences in printing, such as a capital letter, period, spacing of a line, or differences in underlining.

Coding by number of digits

Four digits for free, five digits for reduced price, six digits for paid.

Suggestions:

Schools should change their **medium of exchange** coding systems yearly to prevent the use of the previous year's tickets or tokens.

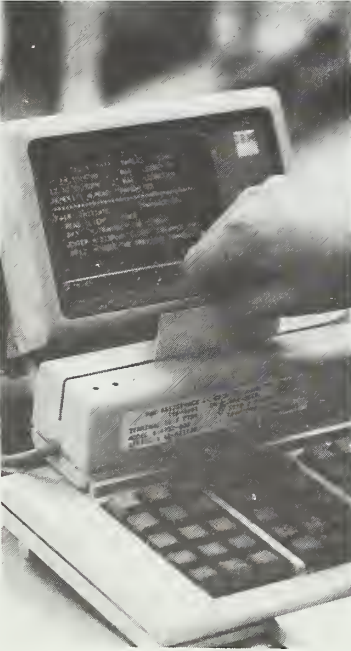
Single-symbol coding methods which are more easily recognized by students as a code, such as A,B,C; X,Y,Z; or 1,2,3, are **not** recommended.

Prohibited:

Color-coding by category is **prohibited**.

Single-symbol coding using obvious identifiers such as F,R,P is **prohibited**.

Examples of Medium of Exchange Systems:

SYSTEM:	ADVANTAGES:	DISADVANTAGES:
<p>Coded ticket/token</p>	<p>When collected at point of service, provides a means of physically counting meals by category.</p> <p>When used in small-to-medium schools, counts by category can be completed quickly after the meal service.</p>	<p>Can be lost, destroyed, transferred, stolen, or sold.</p> <p>In large schools, too cumbersome to collect and count all tickets or tokens by category after the meal service.</p> <p>If not coded properly, may result in overt identification.</p> <p>Few students prepay, so most ticket holders are identified as receiving free or reduced-price meals.</p>
<p>Coded bar line card (computer scan card used for identification)</p> 	<p>Provides accurate count and saves time; compiles the meal count by category at the same time the students are counted.</p> <p>Prevents overt identification on the line.</p> <p>Provides automated reports.</p>	<p>Can be lost, destroyed, stolen, or transferred.</p> <p>Startup and operating costs may be high.</p> <p>If more than one service line, there may be two meals claimed if the electronic machines are not linked.</p> <p>Machines may malfunction; requires a manual backup system.</p>

SYSTEM:	ADVANTAGES:	DISADVANTAGES:
Automated tab tickets	Saves time because count is taken simultaneously with collection of tickets.	Can be destroyed, stolen, lost, or transferred. Machines may malfunction; requires a manual backup system.
Coded ID cards	Not easily transferred if photo is on the card. Can be incorporated as function of student ID card, which may be a savings to SFA.	Can be lost, stolen, or destroyed. May be able to be used twice if there is more than one serving line. Possible high replacement cost.
Verbal identifier (name or number)	Cannot be lost, stolen, or destroyed. Documentation of meal count is produced during meal service as names/numbers are checked off on a roster or number sheet. If used with a number sheet may be a fast method.	Can be used by another student or twice by the same student if more than one serving line. Coded roster sheet is time consuming for cashiers using manual systems. Students may forget their numbers, thus slowing down the line.
Prepayments and/or post billing	Prevents overt identification. Cashiers do not handle money on the line. Helpful to parents in payment plan (pay once a month). May increase students' participation.	Possible problems in collecting the payment. Reduces SFA's cash-flow.

6. Reimbursable Meals:

All meals served in the National School Lunch Program must meet the meal pattern requirements as specified in the program regulations. In order for a meal to be reimbursable, students must be **offered** five food items from the four component meal pattern (milk, meat/meat alternate, bread/bread alternate, and vegetable/fruit) in appropriate serving sizes. Further, students must take five different food items unless the school is participating in the Offer Versus Serve option. Under Offer Versus Serve, a reimbursable meal must contain **at least** three of the five required food items.

GOALS:

Only those meals meeting the meal pattern requirements are counted, recorded, and claimed.



MEANS:

- All of the food service areas from which meals are claimed, including sandwich, salad, deli, and potato bars, are structured so that all five food items are offered and the student is aware of what he or she may take.
- Special attention is paid to self-service lines, where portion controls are difficult to ensure. Examples include potato, salad, and deli bars, and a la carte lines.

The cashier or other person counting the meals must:

- Know what makes up a reimbursable meal, count as reimbursable only those meals meeting the pattern, and understand the concept of unit pricing. Daily review of the menu prior to the meal service is encouraged.
- Be placed at the **point of service**, where it can be determined that each student's meal has all the required food items before the meal is recorded as reimbursable.
- Observe all trays during the meal service to ensure the reimbursability of each meal served.
- Be trained to assess multicomponent menu items such as pizza and tacos.

Examples of Reimbursable and Nonreimbursable Meals

Are these meals reimbursable?*

TRADITIONAL:

- _____ 1. Taco salad
Crushed pineapple
Milk
- _____ 2. Hamburger/bun
Potato chips
Fruit cup
Milk
- _____ 3. Oven-baked chicken
Mashed potatoes
Milk
Ice cream
- _____ 4. Pizza
Tossed salad/crackers
Fresh fruit
Milk
- _____ 5. Tuna noodle casserole
Peas
Roll
Milk

OFFER VS. SERVE:**

- _____ 1. Hamburger patty
Cheese sticks
Milk
- _____ 2. Spaghetti w/sauce
Milk
- _____ 3. Chef salad
Milk
- _____ 4. Rice and gravy
Corn muffin
Milk
- _____ 5. Taco
Milk
Chocolate cake
- _____ 6. Two pieces pizza
Milk
- _____ 7. Hot dog/bun
Corn chips
Milk
- _____ 8. Two cartons milk
Roll
- _____ 9. Hamburger/bun
Potato chips
Ice cream
- _____ 10. Peaches/cottage cheese
Jello
- _____ 11. Squash
Green beans
Cornbread
- _____ 12. Oven-baked chicken
Mashed potatoes
Brownie



*Assume all portions are in **one** serving size.

This assumes that **all five items are offered.

Answers:

Traditional: 1.Y; 2.N; 3.N; 4.Y; 5.N.
Offer vs. serve: 1.N; 2.Y; 3.Y; 4.N; 5.Y; 6.Y; 7.Y; 8.N; 9.N; 10.N; 11.Y; 12.N.

7. Point of Service Meal Counts: A meal count system at a point in the service line where it can accurately be determined that a reimbursable meal has been served to an eligible child.

AccuClaim rule: "Claims for reimbursement shall be based on daily counts, at the point of service, which identify the number of free, reduced-price and paid reimbursable lunches served, unless otherwise authorized at the discretion of the State agency on a case-by-case basis." [S210.7 (c)]

GOALS:

A point of service meal count system which ensures that:

Meals counted meet the meal pattern and are correctly recorded by category.

Eligibility status of the child receiving the meal can be entered at the point of service.

MEANS:

- The medium of exchange is transferred at a point in the service line where it can be determined that a reimbursable meal has been served.
- Daily totals of meals served by category are recorded at the end of the meal service.
- A system is established to take and record meal counts correctly for visiting students.
- In some systems, the person responsible for recording meal counts must be able to correctly interpret and record eligibility information coded on the medium of exchange.
- Controls are established to prevent unauthorized use of the medium of exchange.

Point of Service (continued)

GOALS:

Only **one** meal per child is claimed for reimbursement for each meal service.



MEANS:

- Only one reimbursable meal is counted for each child served for each meal service. Second meals are to be counted as extra meals, **not** as paid reimbursable meals.
- Meal counts reflect the actual number of meals served by category and should **not** be calculated backwards from the total meals served and cash collected.
- Controls are established to prevent mediums of exchange from being used twice in the same meal service.
- A backup system is established to handle instances of lost, stolen, or destroyed mediums of exchange.



Individual Assessment of the Meal Count System

Directions: Use this questionnaire to assess your meal count system.

- | | YES | NO |
|---|--------------------------|--------------------------|
| 1. Can the cashier identify a reimbursable meal for these types of meal service:
—Traditional? | <input type="checkbox"/> | <input type="checkbox"/> |
| —Offer vs. serve? | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Does the cashier review the menu before the meal service? | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Is the cashier located where a complete meal (i.e., at the point of service) can be observed? | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. Does the cashier know the policies for handling:
—Lost, stolen, forgotten, or destroyed tickets, tokens, IDs? | <input type="checkbox"/> | <input type="checkbox"/> |
| —Visiting student meals? | <input type="checkbox"/> | <input type="checkbox"/> |
| —Nonrevenue meals? | <input type="checkbox"/> | <input type="checkbox"/> |
| —Adult meals? | <input type="checkbox"/> | <input type="checkbox"/> |

- | | YES | NO |
|---|--------------------------|--------------------------|
| 5. Is a current eligibility list maintained and available to the cashier for each reference? | <input type="checkbox"/> | <input type="checkbox"/> |
| 6. Is there an accurate method for counting meals by category? | <input type="checkbox"/> | <input type="checkbox"/> |
| 7. Is there a method of recording nonreimbursable meals (distinguishing them from reimbursable meals), i.e., second meals, meals that don't meet meal requirements? | <input type="checkbox"/> | <input type="checkbox"/> |
| 8. Is there a second-party count of cashier's cash intake? | <input type="checkbox"/> | <input type="checkbox"/> |
| 9. Is it ensured that counts are not adjusted or "backed out" to correspond with cash intake? | <input type="checkbox"/> | <input type="checkbox"/> |
| 10. Is there a method for tracking extra sales? | <input type="checkbox"/> | <input type="checkbox"/> |
| 11. Is cash reconciled daily and differences recorded? | <input type="checkbox"/> | <input type="checkbox"/> |
| 12. Is a trained backup cashier available? | <input type="checkbox"/> | <input type="checkbox"/> |

8. Cash Management: Cash collection and reconciliation systems and procedures to safeguard cash and the medium of exchange.

GOALS:

Cash reconciliation system that:

Determines on a daily basis whether cash collected reconciles with meal counts as recorded;

Ensures that all differences are documented; and

Ensures that corrective action is taken where needed.



MEANS:

- Verify beginning cash prior to meal service.
- At the end of the serving period, count actual cash collected and record that figure. This count should be taken without regard to the meal count. Never merge the cash collected by different individuals until an individual count is taken and recorded.
- Determine the amount of potential income (money that should have been collected based on the count per category and extra sales). Record this figure on a daily reconciliation form (see page 18).
- Compare the actual cash collected with the potential figure. Record all differences (overages and shortages). Do not force figures to balance. Do not adjust meal counts to balance cash collected.
- Implement internal controls to verify meal counts and cash collected (such as by second-party checks).
- Note the frequency and magnitude of errors in cash reconciliation, and provide additional technical assistance to the cashier when error discrepancies are frequent or significant.

Cash Management (continued)

GOALS:

Cash collection system for reimbursable meals and other sales that ensures that the appropriate amount of cash is collected and recorded for each sale category.

A system to safeguard cash, tickets, tokens, IDs, etc., from loss, theft, or misuse.

MEANS:

- Determine and document for each transaction the correct amount of cash based on the sale category (reduced-price, paid, adult meals, or extra sale items).
- When meals are served and no revenue is collected at the point of service (charged or prepaid), take counts by category so cash can be properly reconciled at the end of the meal service period.

- Keep cash, tickets, tokens, etc., secure by:
 - Storing them under lock and key;
 - Transporting cash in suitable containers;
 - Not leaving cash drawer unattended;
 - Making cash deposits as needed to avoid having large amounts of cash on hand;
 - Establishing clear accountability for the handling of cash.

Cash Reconciliation for Day of Review

	COUNTS	PRICE	POTENTIAL CASH
Potential income			
1. Reduced-price meals			
a. Paid for today	_____	_____	_____
b. Prepayments received	_____	_____	_____
c. Charges paid today	_____	_____	_____
d. Subtotal			_____
2. Paid meals			
a. Paid for today	_____	_____	_____
b. Prepayments received	_____	_____	_____
c. Charges paid today	_____	_____	_____
d. Subtotal			_____
3. Adult meals			
a. Paid for today	_____	_____	_____
b. Prepayments received	_____	_____	_____
c. Charges paid today	_____	_____	_____
d. Subtotal			_____
4. Total potential cash			_____
Actual cash			- _____
Difference			= _____

9. **Reports:** Record of daily meals served and cash collected and the compilation of this data for the Claim for Reimbursement.

GOALS:

System accurately records and reports daily point of service meal counts by category to the SFA.

System accurately records and reports daily cash collected by category to the SFA.



SFA prepares an accurate monthly summary of meals eligible for reimbursement in all schools.

MEANS:

- School prepares daily report including:
 - Number of paid meals served;
 - Number of reduced-price meals served;
 - Number of free meals served;
 - Number of adult meals served; and
 - Number of second meals.
 - Reports are checked for accuracy by a second party.
-
- School completes daily record of income collected for:
 - Paid meals served;
 - Reduced-price meals served;
 - Adult meals served;
 - Extra sales;
 - A la carte sales;
 - Prepayments;
 - Charged meals.
 - School records actual income collected and potential income and documents any differences between them.
 - Reports are checked for accuracy by a second party.
-
- Reports are checked for accuracy by a second party.

10. Edits: A system of comparisons and calculations for individual schools and SFAs to identify potential problems in the meal count system and facilitate count/report accuracy.

AccuClaim rule: "Prior to the submission of a monthly Claim for Reimbursement, each school food authority shall compare each school's daily claim against data which will assist in the identification and correction of claims for reimbursement in excess of the number of reimbursable free, reduced-price and paid lunches actually served that day to children eligible for such lunches. Such data shall, at a minimum, include the number of children currently approved for free and reduced-price lunches in that school, and, for every month except September,

the average daily number of free, reduced-price and paid lunches served for the preceding month. School food authorities shall also compare claims against any other data available to the school food authority, such as a school's average daily attendance, enrollment or membership data, and a factor which accurately accounts for the difference between enrollment and attendance at any given time" [S210.8(a)(2) and (3)]

GOALS:

A system to edit and correct counts and reports that will:

Ensure accurate counts of meals served;

Identify and evaluate potential problems and/or discrepancies;

Help resolve or document reasons for discrepancies.

MEANS:

- Edit checks are performed by SFA personnel to compare each school's daily free, reduced-price, and paid meal counts to:
 - The number of children currently eligible for free, reduced-price, and paid meals, respectively, times an attendance factor; and
 - The preceding month's average daily participation for each category (except for the first month of the school year).
- Personnel performing the edit checks should also look for indications of possible problems, for example:
 - Patterns of numbers, repetition of numbers, or constant counts by category;
 - Served count equal to delivery count for vended meals;
 - Identical or very similar claiming pattern; and/or
 - Large changes in meal counts, especially the free meal count.
- Edit checks are performed in a timely (monthly) and efficient manner so that reports can be generated and discrepancies resolved and documented.

EDITS (continued)

Factors to know for performing edit checks:

- **Attendance factor**—means a factor that accurately accounts for the difference between enrollment and attendance at any given time. The attendance factor may be developed by the school food authority subject to State agency approval or may be developed by the State agency. If reliable enrollment and attendance data are available, an attendance factor can be calculated by dividing the average daily attendance for a period of time by the total enrollment for that same period of time.
- **Average daily participation for each category**—is the number obtained by (1) dividing the total number of free meals claimed during a reporting period by the number of operating days in the same period; (2) dividing the total number of reduced price meals claimed during a reporting period by the number of operating days in the same period; and (3) dividing the total number of paid meals claimed during a reporting period by the number of operating days in the same period.
- **Children currently eligible for free meals**—means the number of children eligible based on approved free applications minus any of those children no longer eligible for free meals due to transfers, reported changes in income or household size, or findings during verification, etc.
- **Children currently eligible for reduced-price meals**—means the number of children eligible based on approved reduced-price applications minus any of those children no longer eligible for reduced-price meals due to transfers, reported changes in income or household size, or findings during verification, etc.
- **Children currently eligible for paid meals**—means the number obtained by subtracting the number of children currently eligible for free and reduced-price meals from the total enrollment.

Edit Check Worksheet

The following worksheet presents an approach for schools and school food authorities to perform edit check calculations and comparisons. Numbers are given as examples.

School/SFA Edit Check Worksheet

1. School EDISON H.S.
2. Month DECEMBER
3. Attendance Factor (AF) 96%
4. Total Enrollment 3700

5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Day of Month	Free Eligible	Free Eligible x AF	ADP Free Last Month	Free Count	Reduced Price Eligible	RP Eligible x AF	ADP RP Last Month	RP Count	Paid Eligible	Paid Eligible x AF	ADP Paid Last Month	Paid Count	Total Counts	Comments
3	560	540	510	500	290	280	240	250	2850	2730	1400	1300	2050	
4	—	—	510	0	—	—	240	0	—	—	1400	—		SNOW DAYS
5	560	540	510	240	290	280	240	510	2850	2730	1400	1330	2080	TRANSPOSED #
6	560	540	510	520	290	280	240	260	2850	2730	1400	1250	2030	
7	560	540	510	540	290	280	240	270	2850	2730	1400	1700	2510	PIZZA DAY-HIGH PARTICIPATION
10	500	480	510	470	320	310	240	300	2880	2760	1400	1350	2120	VERIFICATION CHANGED # ELIG.
11	500	480	510	550	320	310	240	350	2880	2760	1400	1450	2350	VISITING STUDENTS

- | | |
|--|--|
| <p>Column 1. School</p> <p>Column 2. Month</p> <p>Column 3. Attendance Factor</p> <p>Column 4. Total Enrollment</p> <p>Column 5. Day of the month.</p> <p>Column 6. Free Eligible.</p> <p>Column 7. Free Eligible x Attendance Factor.</p> <p>Column 8. ADP Free, preceding month.</p> <p>Column 9. Free Meal Count.</p> <p>Column 10. Reduced Price Eligible.</p> | <p>Column 11. Reduced Price Eligible x Attendance Factor.</p> <p>Column 12. ADP Reduced Price, preceding month.</p> <p>Column 13. Reduced Price Meal Count.</p> <p>Column 14. Paid Eligible.</p> <p>Column 15. Paid Eligible x Attendance Factor.</p> <p>Column 16. ADP Paid, preceding month.</p> <p>Column 17. Paid Meal Count.</p> <p>Column 18. Total Meal Count</p> <p>Column 19. Comments—write in explanations for any counts that exceed the edit checks.</p> |
|--|--|

Directions for Edit Check Worksheet

SFAs are required to carry out data comparisons to determine the reasonableness of school meal counts. Schools may carry out the same or similar checks before submitting their data to the SFA. SFAs are to compare school counts with the required data to identify potential count problems. These “edit checks” are intended to enable SFAs to recognize potential inaccuracies if they discover significant variances or anomalies in meal counts from day to day or from month to month.

To perform an edit check of daily claim numbers, compare for each day:

1. column 9 (free count) against columns 6, 7, and 8.

Problems needing “investigation”*:

- column 9 is greater than column 6 on any day: check with school to see if there were any visiting students from another school in the SFA; if that was not the case, check for errors in either figure.
- column 9 is greater than column 7 by a significant amount on any individual day, or is consistently greater than column 7: check for errors in either figure.
- column 9 is significantly different from column 6: check for possible reasons, such as differences in weather, graduations, etc., to explain the difference.

*“Investigation” can include contacting school to have numbers re-checked, checking school’s data such as enrollment and attendance figures, checking menu for possible reasons for high or low participation, checking for other reasons for unusual numbers (i.e. weather, visiting students, illnesses, transient populations).

2. column 13 (reduced-price claimed) against columns 10, 11, and 12

Problems needing investigation:

- column 13 greater than 10, 11, and 12 (follow the same procedures as above for free).
3. column 17 (paid count) against columns 14, 15, and 16.

The following offers some examples of how to interpret the numbers during an edit check. This exercise is based on the numbers identified in the chart and is not intended to be all-inclusive.

Day 3: No problem.

Day 4: No problem.

Day 5: Problem

Free: The free meal count is greatly under the expected meal count.

Reduced-price: The reduced-price meal count is greatly over the expected count. Check to see why the free meal count is low and the reduced-price meal count is high. Possible cause: the numbers may have been transposed by mistake.

Day 6: No problem.

Day 7: Potential problem

Free: The free meal count equals the free eligible x attendance and exceeds the free ADP for preceding month.

Reduced-price: The reduced-price meal count is less than the reduced-price eligible x attendance factor but exceeds the reduced-price ADP for preceding month by more than a normal range of deviation.

Paid: Paid meal count is less than paid eligible x attendance factor but exceeds the paid ADP for preceding month by more than a normal range of deviation.

Check the reasons why the free, reduced-price and paid meal counts exceed those for the preceding month. It is possible

no problem exists, but it should be investigated. (Note: the total is also higher than normal.)

Day 10: Problem

Free: The number of free eligibles is less than previous days of the month.

Reduced price: The number of reduced-price eligibles is higher than previous days of the month.

Check the reasons for higher reduced-price and lower free eligibles. Possible cause: May be verification findings, changes in income, etc.

Day 11: Problem

Free: The free meal count is higher than the free eligible x attendance factor and the free ADP for the preceding month.

Reduced price: The reduced-price meal count is higher than the reduced-price eligible x attendance factor and the reduced-price ADP for the preceding month.

Paid: The paid count exceeds the paid ADP count for the preceding month.

Check the reasons for free, reduced-price and paid meal counts higher than the free and reduced-price counts, respectively, x appropriate attendance factors and free, reduced-price and paid ADP, respectively, for the preceding months. Possible cause: Eligible students may have been visiting? (Note that the total meal count is higher than normal.)

Miscellaneous: Potential problem. Why are free and reduced-price counts up from the previous month? Are there more eligible, better attendance, higher participation?

11. **Monitoring:** Internal controls carried out by the SFA to ensure that an accurate claim for reimbursement has been made.

AccuClaim rule: "Every school year, each school food authority with more than one school shall perform no less than one on-site review of each school under its jurisdiction. The on-site review shall take place prior to February 1 of each school year. Further, if the review discloses problems with a school's meal counting or claiming procedures, the

school food authority shall: ensure that the school develops and implements a corrective action plan; and within 45 calendar days of the review, conduct a follow-up on-site review to determine that the corrective action resolved the problems." [S210.8(a)(1)]

GOALS:

Make no less than one onsite visit annually to review the counting system.

Use effective monitoring to enforce compliance with program requirements.

Review individual school claims to ensure that those claims are consistent with the numbers of eligible students participating by category.

Use corrective action when problems are disclosed.

MEANS:

- Conduct on-site review prior to February 1 of each school year.
- Where corrective action is needed, conduct a follow-up review within 45 calendar days.
- Make unannounced visits during the entire meal service to observe all the serving lines.
- Take a count of a single line for at least one meal service period and compare that count to the school's count.
- If necessary, additional onsite reviews should be conducted by the SFAs to ensure that an accurate accounting system is in operation.

